

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GMA ACCESSORIES, INC.

Plaintiff,
- against -

Civil Action No.: 07CV3219 (LTS) (DCF)

EMINENT, INC., SAKS FIFTH AVENUE, INC.,
INTERMIX, INC., WINK NYC, INC.,
LISA KLINE, INC., GIRLSHOP, INC.,
SHOWROOM SEVEN STUDIOS, INC.,
JONATHAN SINGER, LEWIS TIERNEY and
JONATHAN SOLNICKI,

Defendants.

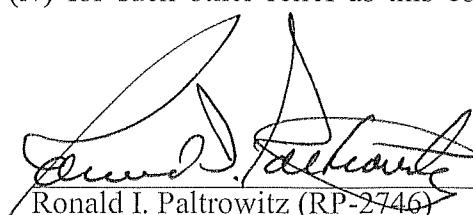
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NOTICE OF MOTION TO COMPEL

PLEASE TAKE NOTICE upon the Declaration of Ronald I. Paltrowitz, Esq., dated March 17, 2008, and the exhibits annexed thereto, and the Memorandum of Law dated March 17, 2008, the undersigned hereby moves this Honorable Court, before Hon. Debra Freeman, U.S.M.J., at 500 Pearl Street, New York, New York for an Order (1) pursuant to Rules 37(a)(1), 37(a)(3)(B)(i) and 45 of the Federal Rules of Civil Procedure (“Fed.R.Civ.P.”) compelling non-party deponent Charlotte B LLC to answer questions properly put to deponent’s designated witness pursuant to Fed.R.Civ.P. Rules 30(a)(1), 30(b)(6), and 45; (2) pursuant to Fed.R.Civ.P. Rule 37(a)(3)(B)(ii) and Fed.R.Civ.P. Rule 45 compelling non-party deponent Charlotte B LLC to designate a proper witness pursuant to Fed.R.Civ.P. Rule 30(b)(6); (iii) for appropriate sanctions pursuant to Fed.R.Civ.P. Rule 30(d) (2); and (iv) for such other relief as this court deems just and proper.

Dated: New York, New York
March 17, 2008

By:


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